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January 28, 2022

By ECF

Hon. Philip M. Halpern
United States District Judge
The Hon. Charles L. Brieant Jr.
Federal Building and United States Courthouse
300 Quarropas St.
White Plains, NY 10601-4150

Re: *United States v. Dwight Reid et al.*, 20 Cr. 626 (PMH)

Dear Judge Halpern:

We write on behalf of the remaining defendants, with the consent of the Government, to respectfully request that the defense be granted an additional thirty days with which to file our motions. Defense motions are currently due on February 15, 2022, the Government's response is due on April 1, 2022, with defense replies due on April 22, 2022. After consultation with the Government concerning our request, we have agreed that no further adjournments will be requested, and that the Government be permitted sixty days with which to respond to our motions.

There is, we submit, ample good cause for this request. At the outset, counsel for Christopher Erskine, Lorraine Gauli-Rufo, has been recently assigned to this matter and requires additional time to review the discovery, consult with her client and prepare any motions deemed viable. Second, as a result of the surge of the Omicron variant of the COVID-19 virus, all visits at the Metropolitan Detention Center were suspended in December 2021. As of this writing, visits have not resumed.

While video visits are possible, they last for an hour and even when they are implemented on time, they are not sufficiently effective for us to discuss the voluminous discovery and motions with our clients. There were dozens of warrants issued in this case, including wiretap motions in which several defendants are purportedly overheard. In addition to these warrants, there are terabytes of additional discovery that we have been reviewing. The sheer volume of discovery is truly daunting.

We assure the Court that we have exercised our best efforts to comply with the schedule originally set. We have conferred with each other in an effort to combine our motions pursuant to Your Honor's directive, we have had a joint meeting to follow-up on these efforts and we are continuing our coordination in this regard.

Based on the foregoing, we respectfully request additional time to file defense motions in comportment with the terms set forth above.

Respectfully submitted,

_____/s/____

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c.c

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